

Post-Meeting Editorial Suggestions Provided by Panel Members

Comments from Dr. Jana Milford

Section 1.1, p. 13 par. 2. The “policy-related questions” in this paragraph could be sharpened or narrowed to better characterize the analysis that was performed, recognizing key limitations up front. With respect to question (a), the TSD doesn’t address “potential risk to public health” but more narrowly addresses potential risk to high-end self-caught freshwater fish consumers in the U.S. In question (b), it would be helpful if the footnote (fn 15) could also explain what is meant by CAA requirements, noting in particular whether the section 112 requirements for addressing mercury from EGUs are or are not included. For question (c), it seems important to recognize that the apportionment question is still restricted to apportionment for high-end self-caught freshwater fish consumers in the U.S.

Section 1.1, pp. 13 – 14. The limitations of considering fish consumption as the exposure route and focusing on neurological deficits in children are appropriate. However, other health endpoints in humans and mercury impacts on wildlife should also be acknowledged.

Section 1.1, p. 15, bullet 1. Clarification is needed on what is meant by “potential HAP emission reductions from CAA requirements” for the 2016 scenario. Also, the preamble for the mercury rule notes that 2010 mercury emissions may be underestimated, due to biased sampling (76 FR 25006). This should be mentioned here.

Section 1.1, p. 15, bullet 3. It seems misleading to characterize the TSD as “assess[ing] risk for a set of subsistence populations active at inland watersheds.” Better wording might be to say the TSD “assesses potential risk of subsistence fishing at inland watersheds”, since the size of the populations at issue is not considered.

Section 1.1, p. 16 fn, 22. Please do not say women of childbearing age would have to either fish themselves or be associated with male fishers. Women who eat non-commercially caught fish could be supplied by other women, too. Furthermore, the wording of this footnote inappropriately and unnecessarily undercuts the analysis in the TSD by saying the TSD analysis addresses “a subset of female subsistence consumers that *we believe (a) are reasonably likely to exist* at a subset of our watersheds ...” In fact subsistence fishing is *known* to occur in inland water bodies in the U.S., so the existence of these consumers is not in question.

Throughout this section in the text and table captions, the term “potential risk estimates” should be used instead of “risk estimates,” again reflecting the point that the size of the populations at issue hasn’t been estimated and the analysis only attempts to estimate what might happen if fish were consumed at the levels seen in these populations.

Section 2, p. 52. It would be helpful to have risk estimates for 2016 for the full set of fishing populations (parallel to Table 2-8 for 2005), rather than be told we can “infer” them.

Section 2.8, p. 63, bullet 1. This bullet refers to U.S. EGUs contributing up to “11% of total mercury emissions” but this must be a typo. Apparently it should say “11% of total Hg deposition.”

Section 2.8, p. 63, bullet 4. This bullet is poorly worded. The statement that “the actual number of ‘at risk’ watersheds ... could be substantially larger than estimated” suggests the TSD tried to estimate the total number of at risk watersheds. In fact, the TSD can only be viewed as having tried to estimate the number of watersheds at risk out of the relatively small fraction for which recent fish tissue MeHg data are available.

Comments from Dr. Eric Smith

1. Introduce RfD in text early - it seems to appear as a footnote.
2. Acronyms - check they are spelled out (RfD, HAP, CMAQ, etc)
3. pg 2 bottom .
4. Tables ES1, ES2 clarify the difference in the calculations. ES1 is percentages but ES2 give ratios
5. page 18 middle 5% to 15% 20% clean up. Also after RfD
6. page 25 footnote 27 units do not change
7. pg 31 change emphasis to emphasize
8. page 35 change considerably to considerable
9. page 39 what is meant by total Hg (confuse with mean)
10. page 40 do you mean figure 2-9 not 2-7
11. figure 2-11 is it better to use scenario or case rather than simulation
12. figure 2-13 why does LA change so much, in the previous graphs there are many large circle but not in this figure.
13. page 44 middle change fis to fish
14. page 47 figure 2-17 isn't this data truncated at 40? If so, mention in text
15. I think I would add strongly to correlated in the second bullet, as there is evidence of an increase but a rather weak one.
16. check spelling in last sentence of 2nd bullet - expected tos. bottom.
17. page 49 towards bottom change rick to risk
18. page 64 - give the percentage for next to last bullet - what is a significant majority
19. page 77 BW not spelled out